



Attorneys at Law
One State Street Plaza
New York, New York 10004-1561
Telephone: 212-732-8700 * Facsimile: 212-227-2903
Firm E-mail: McAF@mcf-esq.com

STEPHANIE SCHNEIDER
Telephone Ext. 2265
Email: stephanieschneider@mcf-esq.com

September 8, 2022

VIA ECF

Magistrate Judge Stewart D. Aaron United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Jingyuan Yang and Yan Li, Individually and as parents and natural guardians of S.Y., an infant v. United States of America, New York-Presbyterian Healthcare System, Inc. d/b/a New York-Presbyterian Lower Manhattan Hospital and New York-Presbyterian Weill Cornell Medical Center
Index No. #: **21-cv-6563 (SDA)**

Dear Magistrate Judge Aaron:

We represent THE NEW YORK AND PRESBYTERIAN HOSPITAL s/h/a NEW YORK-PRESBYTERIAN HEALTHCARE SYSTEM, INC. d/b/a NEW YORK PRESBYTERIAN LOWER MANHATTAN HOSPITAL AND NEW YORK PRESBYTERIAN WEILL CORNELL MEDICAL CENTER in the above referenced action.

In accordance with Your Honor's order of December 16, 2021, Fact Discovery is due to be completed by September 16, 2022. However, we respectfully request additional time to complete Fact Discovery in this matter as Plaintiffs' counsel has designated three (3) additional witnesses from New York Presbyterian Hospital: Dr. Cynthia Isedeh, Nurse Kaliya Alfred, and Nurse Renee Samuels. The United States may also designate one to two additional New York Presbyterian witnesses. We have already produced four (4) witnesses from the hospital for depositions and need additional time to produce these remaining witnesses. We anticipate completing these depositions by November 30, 2022.

In light of this, we also request that the time to provide Expert Discovery be extended to March 2, 2023, with interim expert discovery deadlines for Plaintiffs' expert reports on



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December 30, 2022, and Defendants' expert reports on January 31, 2023; and that the time to be ready for trial be extended to April 14, 2023.

This is the first request to extend the discovery schedule in this matter. All parties consent to this request.

Thank you for your courtesy and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stephanie P. Schneider'. The signature is fluid and cursive.

Stephanie P. Schneider

SPS/na

cc: Counsel of record (Via ECF)